

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

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DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**Jody Edwin GRIFFITH,**

**plaintiff,**

**vs.**

**Case No: 2:07-CV-749-MEF**

**Gary ANDERSON, et al.,**

**defendants.**

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**MOTION FOR DISCOVERY AND PRODUCTION OF DOCUMENTS**

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**Comes now, the Plaintiff, pursuant to Rules 26 and 34, Fed.R.Civ.P, and requests that the court issue an order requiring the defendants to produce to the plaintiff within 30 days copies of the following documents and materials:**

**1. All medical records pertaining to the Plaintiff in the possession or custody of defendant Alabama Department of Corrections.**

**2. All photographs that were taken of Plaintiffs injuries.**

**3. All records and documents related to the Alabama Department of Corrections Investigation and Intelligence (I & I) Division's investigation into the incident involving the Plaintiff's being assaulted on 11-23-06.**

4. Transcripts of all tape-recorded statements and/or interviews conducted by the Investigation and Intelligence Division

5. All records and documents pertaining to the incident on 11-23-06 that are relevant to the case at bar, including: a) Incident Report written by defendant Gary Anderson; b) Statements that were given by other officers and witnesses; c) Second shift sign-in roster showing all on-duty personnel and their specific job assignments; d) Segregations post duty log showing inmate movement within the blocks along with documented times; e) Second shift clerk's log showing actions taken during the shift; f) Central control's phone log; g) Segregation Inmate Bed Roster for 11-23-06; h) All other incident reports involving the use of force pertaining to defendants Anderson and/or Peterson.

6. Any and all other records, documents, photographs, tapes, transcripts, etc., that may be relevant to the case at bar.

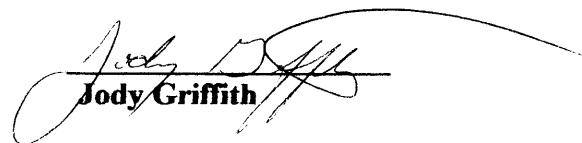
Respectfully submitted,

  
Jody Griffith  
Plaintiff, pro se

Jody Griffith #249169  
E-18 Limestone CF  
28779 Nick Davis Road  
Harvest, AL 35749

**CERTIFICATE OF SERVICE**

I hereby swear or affirm that I have served a copy of the foregoing 'Motion for Discovery and Production' on the defendants by placing the same in the U.S. Mail, postage prepaid, addressed to the Alabama Department of Corrections, Legal Division, P.O. Box 301501, Montgomery, Alabama, 36130, on this 11th day of September 2007.

  
Jody Griffith

Jody Griffith 249169  
 Limestone C.F. E-18B  
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HUNTSVILLE / ALA  
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